

1 IN THE UNITED STATES DISTRICT COURT FOR THE  
2 EASTERN DISTRICT OF OKLAHOMA

3

4 REBECCA ROYSTON,

5 Plaintiff,

6 -vs- Case No. 19-cv-274-Raw

7 JOHNNY CHRISTIAN, in  
8 his official and  
individual capacity,  
et al.,

9 Defendants.

10

11

12 DEPOSITION OF LISA PLATFOOT

13

TAKEN ON BEHALF OF THE PLAINTIFF

14

ON JANUARY 22, 2021, BEGINNING AT 12:58 P.M.

15

IN TULSA, OKLAHOMA

16

VIA ZOOM

17

APPEARANCES

18

on behalf of the PLAINTIFF

19

Mr. J. Spencer Bryan (Via Zoom)

20

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23

24 (Appearances continued on next page.)

25 REPORTED BY: Shannon S. Harwood, CSR, RPR, CRR

1           A. I notified her that the patient, inmate was  
2 sent out based on my recommendations, and at that point,  
3 the order was given.

4           Q. So is it your understanding that Ms. Royston  
5 was transported to the hospital based upon the  
6 authorization of Michelle Sturdivant?

7           MR. WINTER: Form.

8           A. No, she was transported to the hospital based  
9 on my recommendations of the -- I visualized her and  
10 attempted to assess her vital signs.

11          Q. (By Mr. Bryan) Okay. So you assessed  
12 Ms. Royston, made the recommendation to Ms. Sturdivant  
13 who then authorized the transport, and that's when  
14 things started to happen; is that correct?

15          MR. MILLER: Object -- object to the form.

16          Q. (By Mr. Bryan) I'm trying to understand -- do  
17 you understand what I'm -- what I'm asking,  
18 Ms. Platfoot?

19          A. I recommended that she be transferred and then  
20 I asked for the order, because I didn't feel that -- I  
21 felt that she needed to be transported and  
22 Ms. Sturdivant was not there physically to see her, so  
23 it's safety first and forgiveness later.

24          Q. Were you aware of any effort to do anything  
25 about transporting Ms. Royston prior to you making the

1 recommendation to Ms. Sturdivant?

2 A. No, sir. I don't -- I don't have anything to  
3 do with how they transport. I make recommendation. As  
4 a medical professional, I make recommendation. It is  
5 the sheriff's department or state department or whomever  
6 facility I'm at. After that, I'm out. I can't -- I  
7 don't have any control of that. They're in custody.

8 That's a security issue.

9 Q. Right. And I'm just talking about your  
10 recommendations. And it was your understanding there at  
11 the facility that day that the effort to get Ms. Royston  
12 to the hospital began once you made a recommendation to  
13 have her transported. Is that consistent with your  
14 recollection?

15 MR. MILLER: Object to form.

16 A. Yes, sir.

17 MR. WINTER: And, Spencer, I don't want to  
18 throw you off here. Continue as long as you need to,  
19 but I'm requesting a bathroom break whenever you get to  
20 a stopping point.

21 MR. BRYAN: No, this is fine. This is a good  
22 spot.

23 MR. MILLER: Okay. Take another break.

24 THE WITNESS: Okay.

25 (A recess was taken from 3:07 p.m. to

1 3:16 p.m.)

2 Q. (By Mr. Bryan) Okay. We were asking --  
3 before the break, I was asking you questions about  
4 conversations with three individuals; Ms. Brauer,  
5 Ms. Sturdivant and Mr. Johnson. We had I believe gotten  
6 through Ms. Brauer and Ms. Sturdivant, but I want to be  
7 clear. Are there any other conversations about Rebecca  
8 Royston that you have not already discussed that you had  
9 with Ms. Brauer and Ms. -- or Ms. Sturdivant?

10 A. No, sir.

11 Q. All right. The last person that you  
12 identified as having specific conversations about  
13 Rebecca Royston would be Mr. Johnson. Tell me about the  
14 conversations that you had with Mr. Johnson about  
15 Rebecca Royston.

16 A. Mr. Johnson approached me not too long after  
17 -- like almost immediately after I arrived at the  
18 facility, got into the office, started in with my daily  
19 routine, Mr. Johnson came to my office and asked me to  
20 look at an inmate that was having some erratic behavior  
21 that was picked up in the middle of the night and asked  
22 me to look at her. And so I grabbed my belongings and I  
23 went to visualize and -- Ms. Royston, who I didn't know  
24 her name at the time and we went to the cell and I  
25 attempted to get vital signs on Ms. Royston, but she was

1      violently rolling and not -- not responding to my voice  
2      commands and she was naked.

3               So when I could not get those things done, I  
4      explained to him or told him that she needed to be  
5      transferred out of the facility as soon as possible.  
6      And he asked me, "What do you mean as soon as possible,"  
7      and I said, "By EMS." That's what I recall. And then I  
8      returned to my office and continued my daily routine.

9               Q.     Would it be fair to characterize this  
10     encounter that happened before you drafted the progress  
11     note?

12               MR. WINTER: Form.

13               A.     Yes.

14               Q.     (By Mr. Bryan) So at the time that you're  
15     writing the progress note, you have already communicated  
16     to Mr. Johnson that it would be your recommendation to  
17     immediately transport Ms. Royston by EMS?

18               A.     Correct.

19               Q.     And if we go back and look at your time  
20     record, it looks like you clocked in at 8:47 that  
21     morning?

22               A.     Uh-huh.

23               Q.     And you charted in the progress notes at 9:45  
24     that morning, so between those two times is when you had  
25     this encounter and conversation with Mr. Johnson; is

1       her course of (Audio distortion).

2           A.     You -- you -- I lost you.

3           Q.     -- admission until the time --

4           A.     I lost you. Start all over. I'm sorry. You  
5     went out and came back in.

6           Q.     Yeah, I apologize for that. Can you hear me  
7     now?

8           A.     Yes, sir.

9           Q.     Okay. What do you recall, if anything, about  
10    what Mr. Johnson told you about Ms. Royston's course of  
11    detention between the time she arrived at the facility  
12    and the time that the two of you were having this  
13    encounter?

14          A.     The only thing that he told me that she  
15    refused medical care at the scene and that's all I know.  
16    That was all I was told. And then I went -- I  
17    visualized her and recommended that she leave the  
18    facility. And then I returned to my office and  
19    continued what I need to do, because there's one nurse  
20    and approximately a hundred-plus inmates.

21          Q.     Right. When you made the recommendation for  
22    transport out of the facility, did you express to  
23    Mr. Johnson that that was needed on an emergent basis?

24           MR. WINTER: Form.

25          A.     Yes, it was urgent, absolutely. And he felt

1 the same.

2 Q. (By Mr. Bryan) How did he express that to  
3 you?

4 A. I do believe he said, "That's what I thought."

5 Q. Did Mr. Johnson tell you anything about the  
6 use of restraints on Ms. Royston prior to your arrival?

7 A. No, sir.

8 Q. Were you familiar or had you ever seen the  
9 football helmet that was used at Bryan County?

10 A. No, I didn't see that specific helmet. I  
11 never seen anybody in that one particularly. I have  
12 seen it -- I have seen helmets used in different  
13 facilities, but I did not see that one specifically at  
14 that location, no, sir.

15 Q. Do you recall which facilities where you've  
16 seen a helmet?

17 A. We used that at Lee County Jail in Fort Myers,  
18 Florida. We used it to protect seizure patients or --  
19 mostly seizure patients or anybody that was having any  
20 kind of behavior with their head. It was for  
21 protection.

22 Q. Any other facilities where you have seen use  
23 of a helmet?

24 A. Pontotoc County did not use a helmet. They  
25 had a complete padded cell, so no, sir. It was mostly I

1 that.

2 Q. And just so the record is clear, between the  
3 9:45 entry and the 1430 entry, you were continuing to do  
4 your -- your jobs there at the facility without anybody  
5 coming and saying, Hey, Rebecca Royston is still here at  
6 the facility or anything like that?

7 MR. WINTER: Form.

8 A. Correct.

9 Q. (By Mr. Bryan) Who do you believe is  
10 responsible for Rebecca Royston remaining at the  
11 facility until she was transported sometime after the  
12 1500 hour?

13 MR. WINTER: Form.

14 MS. DARK: Object to the form.

15 A. I -- I don't have that information. I'm not a  
16 deputy. I don't -- I don't know the process to move a  
17 patient or inmate. I know there's security issues, but  
18 I don't -- I don't know the process.

19 Q. (By Mr. Bryan) And is it correct to say that  
20 you do not have independent authority to order  
21 Ms. Royston to the hospital?

22 A. No, sir, I do not.

23 Q. You have to make the recommendation to Bryan  
24 County, and at that point, it becomes their  
25 responsibility to carry out what your recommendation is?

1 A. Yes, sir.

2 Q. Were you ever aware of any follow-up inquiry  
3 into what happened with Ms. Royston?

4 A. No, sir.

5 MR. WINTER: Same.

6 Q. (By Mr. Bryan) Did anyone from Bryan County  
7 ever come and ask you about it?

8 A. No, sir.

9 Q. And do you have any reason to believe that  
10 your encounter with Ms. Royston was inconsistent with  
11 Turn Key's policy in any way?

12 A. No, sir.

13 MR. WINTER: Form.

14 Q. (By Mr. Bryan) Nobody from Turn Key came to  
15 you and said, you know, We need to change this or modify  
16 this or do this better next time, nothing like that?

17 MR. MILLER: Form.

18 A. No, sir.

19 Q. (By Mr. Bryan) Between the time that you gave  
20 the recommendation to Mr. Johnson and the time that  
21 Ms. Royston was physically transported from the  
22 facility, so just between those two time periods, do you  
23 believe that Rebecca Royston received adequate medical  
24 care?

25 MR. WINTER: Form.

1 MR. MILLER: Form.

2 A. I was not there to assess her, so I made my  
3 recommendation and unless somebody came back and told me  
4 in the back that she was still up there, I would not  
5 have known, so I -- I can't answer that.

6 Q. (By Mr. Bryan) And would it be fair to say  
7 that you're not -- have -- strike that.

8 Would it be fair to say that you don't have  
9 any information about any medical care that Rebecca  
10 Royston would have received between the time that you  
11 gave the recommendation to Mr. Johnson and the time that  
12 she was transported from the facility?

13 MR. WINTER: Form.

14 A. Correct.

15 Q. (By Mr. Bryan) Sitting here today and knowing  
16 what you know, would you do anything different if you  
17 had to do it again?

18 MR. WINTER: Form.

19 A. I -- now, in hindsight, I probably would have  
20 been a little more detailed on my original note.

21 Q. (By Mr. Bryan) What additional things do you  
22 think that you would have included?

23 MR. MILLER: Form.

24 A. I would have included that I recommended that  
25 she be transported immediately by EMS.

1 Q. It had to --

2 MR. WINTER: Form.

3 Q. (By Mr. Miller) -- have been some time after  
4 1:30?

5 A. Correct.

6 Q. Then it states, "EMS was at scene prior to  
7 booking. Unable to provide care per deputy report."  
8 That would be information you got from where?

9 A. From a deputy.

10 Q. Okay. And it states will -- or "Will continue  
11 to monitor," correct?

12 A. Correct.

13 Q. And that is your signature?

14 A. Yes, sir.

15 Q. Okay. You agree with me that it doesn't say  
16 anything about she needs to be transported immediately?

17 A. Absolutely. I stated that earlier.

18 Q. Okay. You would agree with me that you've  
19 already admitted your memory was wrong on a couple of  
20 occasions on this incident, correct?

21 MR. WINTER: Form.

22 A. Correct, but my memory is not incorrect  
23 whatsoever on when I visualized the patient and decided  
24 that she need to go. It was obvious.

25 Q. (By Mr. Miller) And when was that?

1 A. At the time I looked in the cell.

2 Q. Okay.

3 A. That you're saying -- whatever time you said I  
4 looked in the cell, that is the time she needed to -- I  
5 made the recommendation.

6 Q. Okay. That she needed to go to the -- to EMS?

7 A. Yeah. Do you have video of the inside of the  
8 cell and seeing the patient herself?

9 Q. I do.

10 A. Okay. She is very obvious that she needs to  
11 go.

12 Q. Okay. But you didn't write that down?

13 A. No, in retrospect, which is what I said  
14 earlier, now that I'm sitting here, I should have wrote  
15 that in my note, yes, sir.

16 Q. And I presume you weren't trying to  
17 purposefully backdate the report to make it look like  
18 you had seen her earlier in the day, right? You  
19 wouldn't do that?

20 A. No, sir. No, sir.

21 Q. Okay. Because that would be wrong, right?

22 MR. WINTER: Form.

23 A. Absolutely.

24 Q. (By Mr. Miller) Now, Andrew Johnson's  
25 testimony, I believe, was that he did talk to you very

1 even being an issue?

2 A. No, sir.

3 Q. And you don't recall there being a delay?

4 A. No, sir.

5 Q. You're under the impression that you gave a  
6 recommendation and it was followed?

7 A. Correct.

8 Q. And it was followed eventually, she is -- she  
9 is taken out of the facility, right?

10 A. Correct.

11 Q. Do you recall at any point after making the  
12 recommendation saying, "You're not going fast enough,  
13 this is -- this is too much of an emergency, she needs  
14 to go STAT"?

15 A. No, sir, I did not.

16 Q. What did you think -- I realize you can't make  
17 medical -- what's the words -- strike that.

18 A. Diagnosis.

19 Q. Diagnosis, I'm sorry. I realize you can't  
20 make medical diagnoses, but you obviously are an  
21 individual, you're a person. What did you think was  
22 going on with her?

23 MR. WINTER: Form.

24 A. I felt she needed a higher level of care than  
25 I or anybody in that facility could give her.

1           Q.     And I -- correct me if I'm wrong, but I  
2 remember Mr. Miller asking you a series of questions  
3 about how -- or whether or not the jailers at the Bryan  
4 County Jail, if they were receptive to your  
5 recommendations. Do you kind of recall that line of  
6 questioning by Mr. Miller?

7           A.     Yes.

8           Q.     And it's my understanding that your testimony  
9 was, yes, the jailers at the Bryan County Jail were  
10 generally receptive and open to your recommendations; is  
11 that correct?

12          A.     Yes, sir.

13          Q.     So if you made -- if you would have made a  
14 recommendation to transfer a patient, it would be  
15 inconsistent with your prior experience with the jailers  
16 at the Bryan County Jail for that transfer to be delayed  
17 or them to refuse your recommendation, right?

18          A.     Correct.

19          Q.     Okay. And, you know, we've talked a lot about  
20 the timing of what happened. Whether or not your  
21 assessment or your exam or your visualization of the  
22 plaintiff in this case happened at 9:45 or 10:45 or  
23 11:45, regardless your recommendation was let's get this  
24 lady transported out to an outside facility, was it --  
25 wasn't it?

1 MR. MILLER: Object to the form.

2 A. Correct.

3 Q. (By Mr. Winter) Right. So whenever that  
4 happened, your recommendation was the same, correct?

5 MR. MILLER: Object to the form.

6 A. Correct.

7 MR. WINTER: Okay. I think that's the  
8 questions I've got for you. We'll see -- I don't know  
9 if Spencer has followups. I might have a couple after,  
10 but otherwise, that's what I've got for you today, Nurse  
11 Platfoot.

12 THE WITNESS: Okay. Thank you.

13 MR. BRYAN: Ms. Platfoot, I'm going to have a  
14 few follow-up questions and hopefully we can run through  
15 this relatively quickly and get us all out of here.

16 REDIRECT EXAMINATION

17 BY MR. BRYAN:

18 Q. So, primarily, I want to go back and look at  
19 your progress note that we marked as Exhibit 8. Now,  
20 you would agree with me that it very clearly states in  
21 the top left-hand corner there that the progress note is  
22 entered at 8-20-17 at 9:45 a.m., correct?

23 A. That's what the note says, yes, sir.

24 Q. And it is your practice to accurately write  
25 down your progress notes and when you enter them,

1 talked about. That's not -- that's not --

2 A. Okay. I know nothing, no. I knew nothing  
3 about Ms. Royston except for what I seen and evaluated.

4 Q. (By Mr. Bryan) Okay. But -- and whenever you  
5 did see her, you said, "This woman is in such bad shape,  
6 get her to the hospital now," right?

7 MR. MILLER: Object to the form.

8 MS. DARK: Object to the form.

9 A. No, that's not exactly what I said. I said  
10 she needs a higher level of care. She needs to get out  
11 of the facility and go to the hospital.

12 Q. (By Mr. Bryan) Right.

13 A. Yes, sir.

14 Q. Okay. And if they had told you that -- if  
15 they had brought you to see Ms. Royston at 9:45 in the  
16 morning as opposed to 1300, would your recommendation  
17 have been any different?

18 A. I can't answer that.

19 MR. WINTER: Form.

20 A. Because I don't know what her skin would have  
21 looked like at 9:45 versus at 1:00. I don't know her  
22 condition. It is not uncommon for irate or intoxicated  
23 or anything, belligerent inmates to sit in a detox cell  
24 for any amount of time. They are incarcerated.

25 Q. (By Mr. Bryan) So when Mr. Johnson talked to

1           Q     And then sometime around 1500 hours, so  
2 approximately two hours later, Rebecca Royston  
3 is taken from the Bryan County jail and  
4 transported to the hospital. Do you understand  
5 that?

6           A     That's what I understand.

7           Q     Okay. What I'm trying to understand  
8 right now is, from that 1300 hours until 1500  
9 hours, what was your understanding of what was  
10 being done to get Ms. Royston out of cell 67 and  
11 over to the hospital?

12          A     It's not my job to follow up on that.

13          It was my job to make a recommendation to the  
14 sheriff's department, and the sheriff's  
15 department decides action after that.

16          Q     And that's fair. So my understanding,  
17 then, from your testimony would be at  
18 approximately 1300 hours, you would have made  
19 the recommendation to Mr. Johnson that she needs  
20 to go emergently to the hospital, and once that  
21 recommendation is made, then it is up to custody  
22 staff to carry out and make that happen.

23           MR. MILLER: Object to the form.

24           THE WITNESS: Correct.

25          Q     (By Mr. Bryan) Okay. And do you know,